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Attorneys for Defendant
UNITED MEMORIES, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

GSI TECHNOLOGY, INC. a Delaware
Corporation,

Plaintiff,

v.

UNITED MEMORIES, INC., a Colorado
Corporation, and INTEGRATED SILICON
SOLUTION, INC., a Delaware Corporation,

Defendants.

Case No. 5:13-cv-01081-PSG

**UMI'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL MOTION FOR
SUMMARY JUDGMENT AND EXHIBITS
TO THE DECLARATION OF
CONSTANCE F. RAMOS IN SUPPORT OF
UNITED MEMORIES, INC.'S SUMMARY
JUDGMENT MOTION**

Complaint: Filed March 8, 2013
Judge: Hon. Paul S. Grewal

Pursuant to Civil Local Rules 7-11 and 79-5(c) and (d), Defendant United Memories, Inc.
("UMI") moves this Court for administrative relief to file under seal the following:

1. Portions of UMI's Motion For Summary Judgment. Redacted portions of UMI's
Motion for Summary Judgment contain information that plaintiff GSI Technology, Inc. ("GSI") has
designated either "Confidential" or "Highly Confidential – Attorney's Eyes Only" under the
Protective Order [Doc. 50], which GSI considers: (a) Confidential Information, "not generally
known to the public that [GSI] would not disclose to competitors or third parties within the ordinary
course of business, including technical, commercial, financial, personal or business information;" or
(b) Highly Confidential Information, namely, "extremely sensitive 'Confidential Information or
Items,' disclosure of which to another Party or Non-Party would create a substantial risk of serious
harm that could not be avoided by less restrictive means."

2. Exhibits to the Declaration of Constance F. Ramos filed in support of UMI’s Motion For Summary Judgment: Please see attached Exhibit A. These materials contain information that plaintiff GSI Technology, Inc. (“GSI”) or UMI has designated either “Confidential” or “Highly Confidential – Attorney’s Eyes Only” under the Protective Order [Doc. 50], which the designating party considers: (a) Confidential Information, “not generally known to the public that [GSI] would not disclose to competitors or third parties within the ordinary course of business, including technical, commercial, financial, personal or business information;” or (b) Highly Confidential Information, namely, “extremely sensitive ‘Confidential Information or Items,’ disclosure of which to another Party or Non-Party would create a substantial risk of serious harm that could not be avoided by less restrictive means.” In addition, Exhibits 3, 15, 82, 31 and 43 have each previously been filed under seal and in redacted form pursuant to Court order.

A Declaration of Constance F. Ramos in support of this motion to seal the material listed above is filed concurrently herewith.

Dated: May 26, 2015

WINSTON & STRAWN LLP

By: /s/ Korula T. Cherian
Korula T. Cherian
Attorneys for Defendant
UNITED MEMORIES, INC.

SF: 390389

EXHIBIT A

List of Exhibits to the Declaration of Constance F. Ramos filed in support of UMI's Motion For
Summary Judgment, Requested to be filed Under Seal:

| | | | |
|---------|----|--|--|
| Exhibit | 2 | Deposition of Lee-Lean Shu dated May 24, 2013 | Designated under the Protective Order by GSI |
| Exhibit | 3 | Doc. 196 (Second Amended Complaint, "SAC") | Previously FILED UNDER SEAL by Court Order |
| Exhibit | 5 | GSI10133901 | Designated under the Protective Order by GSI |
| Exhibit | 6 | GSI10111365 | Designated under the Protective Order by GSI |
| Exhibit | 7 | GSI10568107 | Designated under the Protective Order by GSI |
| Exhibit | 8 | GSI10567107 | Designated under the Protective Order by GSI |
| Exhibit | 15 | Doc. 176 (Order denying GSI's motion for preliminary injunction) | Previously FILED UNDER SEAL by Court Order |
| Exhibit | 16 | GSI10051765 | Designated under the Protective Order by GSI |
| Exhibit | 17 | Deposition of Lee-Lean Shu dated March 25, 2015 | Designated under the Protective Order by GSI |
| Exhibit | 19 | Doc. 82 (GSI Motion for Preliminary Injunction) | Previously FILED UNDER SEAL by Court Order |
| Exhibit | 20 | GSI10319038 | Designated under the Protective Order by GSI |
| Exhibit | 21 | GSI10694735-36 | Designated under the Protective Order by GSI |
| Exhibit | 22 | Deposition of Robert Gower dated March 31, 2015 | Designated under the Protective Order by UMI |
| Exhibit | 23 | GSI10588891 | Designated under the Protective Order by GSI |
| Exhibit | 24 | Deposition of David Chapman dated April 14, 2015 | Designated under the Protective Order by GSI |
| Exhibit | 25 | GSI10572222 | Designated under the Protective Order by GSI |
| Exhibit | 27 | Deposition of David Chapman dated May 29, 2013 | Designated under the Protective Order by GSI |
| Exhibit | 28 | GSI0030485-86 | Designated under the Protective Order by GSI |
| Exhibit | 31 | GSI's August 13, 2014 Trade Secrets Disclosure | Previously FILED UNDER SEAL by Court Order |
| Exhibit | 33 | GSI's 4th Suppl. Resp. to UMI's Interrogatory Nos. 1-4 (Served 4-27-15). | Designated under the Protective Order by GSI |

List of Exhibits to the Declaration of Constance F. Ramos filed in support of UMI's Motion For
Summary Judgment, Requested to be filed Under Seal:

| | | | |
|---------|----|---|--|
| Exhibit | 34 | GSI0020706 | Designated under the Protective Order by GSI |
| Exhibit | 35 | UMI_0013719 | Designated under the Protective Order by UMI |
| Exhibit | 36 | GSI10195839 | Designated under the Protective Order by GSI |
| Exhibit | 37 | GSI10530311 | Designated under the Protective Order by GSI |
| Exhibit | 38 | GSI0009961-963 | Designated under the Protective Order by GSI |
| Exhibit | 39 | GSI's 3rd Suppl. Resp. UMI ROG Nos. 5-8, 10-12) (served 4-27-15) | Designated under the Protective Order by GSI |
| Exhibit | 40 | Mr. Malackowski's expert report opining on GSI's alleged damages | (FILED UNDER SEAL). |
| Exhibit | 43 | Doc. 93 (6/25/13 Faue Declaration filed in support of UMI's opposition brief to GSI's motion for preliminary injunction | Previously FILED UNDER SEAL by Court Order |